



United States Environmental Protection Agency  
Washington, D.C. 20460

**Formulator's Exemption Statement**  
(40 CFR 152.85)

<b>Applicant's Name and Address</b>  Reckitt Benckiser Morris Corporate Center IV 399 Interpace Parkway Parsippany, NJ 07054-0225	<b>EPA File Symbol/Registration Number</b>  777-XXX
	<b>Product Name</b>  Cousteau
	<b>Date of Confidential Statement of Formula (EPA Form 8570-4)</b>  March 21, 2017

As an authorized representative of the applicant for registration of the product identified above, I here certify that:

(1) This product contains the following active ingredient(s):

Hypochlorous acid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging of another product which contains that active ingredient, which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled. I am an authorized representative of the applicant for registration of the product identified above, I here certify that:

(3) Indicate by checking (A) or (B) below which paragraph applies:

(A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

**OR**

(B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption

**Source**

Active Ingredient	Product Name	Registration Number
Hypochlorous acid	N/A	N/A

<b>Signature</b> 	<b>Name and Title</b> Jennifer De Carlo Senior Regulatory Associate	<b>Date</b> March 21, 2017
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**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

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**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Reckitt Benckiser LLC, Morris Corporate Center IV, 399 Interpace Pkwy, Parsippany, NJ 07054	EPA Registration Number/File Symbol 777-XXX
Active Ingredient(s) and/or representative test compound(s) Hypochlorous acid	Date March 21, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor	Product Name Cousteau

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 03/21/2017	Typed or Printed Name and Title Jennifer DeCarlo / Senior Regulatory Associate
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**Data Matrix**

<b>Date:</b> March 22, 2017	<b>EPA Reg. No./File Symbol:</b> 777-XXX	<b>Page 1 of 3</b>
<b>Applicant's/Registrant's Name and Address:</b> Reckitt Benckiser, LLC Morris Corporate Center IV 399 Interpace Pkwy. Parsippany, NJ 07054-0225		<b>Product Name:</b> <b>Cousteau</b>
<b>Ingredients:</b> Hypochlorous acid (CAS# 7790-92-3)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
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<b>§ 158.2210: Product Chemistry Data Requirements</b>					
830.1550	Product identity and composition	49260301	Simple Science Limited	PER	
830.1600	Description of materials used to produce the product	49260301	Simple Science Limited	PER	
830.1620	Description of production process	49260301	Simple Science Limited	PER	
830.1650	Description of formulation process	49260301	Simple Science Limited	PER	
830.1670	Discussion of formation of impurities	49260301	Simple Science Limited	PER	
830.1700	Preliminary analysis	49260302	Simple Science Limited	PER	
830.1750	Certified limits	49260301	Simple Science Limited	PER	
830.1800	Enforcement analytical method	49260301	Simple Science Limited	PER	
830.1900	Submittal of samples	49260301	Simple Science Limited	PER	
<b>Physical and Chemical Properties</b>					
830.6302	Color	49260303	Simple Science Limited	PER	
830.6303	Physical state	49260303	Simple Science Limited	PER	
830.6304	Odor	49260303	Simple Science Limited	PER	
830.6313	Stability (normal/elevated temperatures, metals and ions)	49962203	Simple Science Limited	PER	
830.6314	Oxidation/reduction: chemical incompatibility	49260303	Simple Science Limited	PER	
830.6315	Flammability	49260303	Simple Science Limited	PER	
830.6316	Explosibility	49962203	Simple Science Limited	PER	
830.6317	Storage stability	49260304	Simple Science Limited	PER	
830.6319	Miscibility	49962203	Simple Science Limited	PER	
830.6320	Corrosion characteristics	49260304	Simple Science Limited	PER	
830.6321	Dielectric breakdown voltage	49962203	Simple Science Limited	PER	

<b>Signature:</b> 	<b>Name and Title:</b> Jennifer DeCarlo Senior Regulatory Associate	<b>Date:</b> March 22, 2017
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<b>Applicant's/Registrant's Name and Address:</b> Reckitt Benckiser, LLC Morris Corporate Center IV 399 Interpace Pkwy. Parsippany, NJ 07054-0225		<b>Product Name:</b> <b>Cousteau</b>
<b>Ingredients:</b> Hypochlorous acid (CAS# 7790-92-3)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
830.7000	pH	49260303	Simple Science Limited	PER	
830.7100	Viscosity	49260303	Simple Science Limited	PER	
830.7300	Density/relative density/bulk density	49260303	Simple Science Limited	PER	
830.7520	Particle size, fiber length, and diameter distribution	49962203	Simple Science Limited	PER	
<b>§ 158.2220: Product Performance Data Requirements</b>					
810.2200	<i>Staphylococcus aureus</i> (ATCC 6538)	49260305	Simple Science Limited	PER	
810.2200	<i>Salmonella enterica</i> (ATCC 10708)	49260306	Simple Science Limited	PER	
810.2200	<i>Pseudomonas aeruginosa</i> (ATCC 15442)	49260307	Simple Science Limited	PER	
810.2200	<i>Streptococcus pyogenes</i> (ATCC 19615)	49260308	Simple Science Limited	PER	
810.2200	<i>Enterococcus faecalis</i> – VRE (ATCC 51575)	49260309	Simple Science Limited	PER	
810.2200	Methicillin Resistant <i>Staphylococcus aureus</i> (ATCC 33592)	49260310	Simple Science Limited	PER	
810.2200	<i>Listeria monocytogenes</i> (ATCC 19117)	49260311	Simple Science Limited	PER	
810.2200	Herpes Simplex Virus Type 1 (ATCC VR-733)	49260312	Simple Science Limited	PER	
810.2200	Herpes Simplex Virus Type 2 (ATCC VR-734)	49260313	Simple Science Limited	PER	
810.2200	Human Immunodeficiency Virus Type 1, Strain HTLV-IIIB	49260314	Simple Science Limited	PER	
810.2200	Influenza A H1N1 (ATCC VR-1469)	49260315	Simple Science Limited	PER	
810.2200	Rhinovirus Type 37 (ATCC VR-1147)	49260316	Simple Science Limited	PER	
810.2200	Human Coronavirus (ATCC VR-740)	49260317	Simple Science Limited	PER	
810.2200	Respiratory Syncytial Virus (ATCC VR-26)	49260318	Simple Science Limited	PER	
810.2200	<i>Trichophyton mentagrophytes</i> (ATCC 9533)	49260319	Simple Science Limited	PER	
810.2200	<i>Escherichia coli</i> (ATCC 11229)	49260320	Simple Science Limited	PER	
810.2200	Canine Parainfluenza (ATCC VR-666)	49962201	Simple Science Limited	PER	

<b>Signature:</b> 	<b>Name and Title:</b> Jennifer DeCarlo Senior Regulatory Associate	<b>Date:</b> March 22, 2017
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<b>Applicant's/Registrant's Name and Address:</b> Reckitt Benckiser, LLC Morris Corporate Center IV 399 Interpace Pkwy. Parsippany, NJ 07054-0225	<b>Product Name:</b> <b>Cousteau</b>	

**Ingredients:** Hypochlorous acid (CAS# 7790-92-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
810.2200	Feline Calicivirus - Surrogate Virus for Norovirus (ATCC CCL-94)	49962202	Simple Science Limited	PER	
	<b>Non-food Contact:</b>				
810.2300	<i>Staphylococcus aureus</i> (ATCC 6538)	49260321	Simple Science Limited	PER	
810.2300	<i>Enterobacter aerogenes</i> (ATCC 13048)	49260322	Simple Science Limited	PER	
810.2300	<i>Streptococcus pneumoniae</i> (ATCC 6305)	49260323	Simple Science Limited	PER	
810.2300	<i>Salmonella enterica</i> (ATCC 10708)	49260324	Simple Science Limited	PER	
810.2300	Methicillin Resistant <i>Staphylococcus aureus</i> (ATCC 33592)	49260325	Simple Science Limited	PER	
810.2300	<i>Enterococcus faecalis</i> - VRE (ATCC 51575)	49260326	Simple Science Limited	PER	
810.2300	<i>Escherichia coli</i> (ATCC 11229)	49260327	Simple Science Limited	PER	
	<b>Food Contact:</b>				
810.2300	<i>Staphylococcus aureus</i> (ATCC 6538)	49260328	Simple Science Limited	PER	
810.2300	<i>Salmonella enterica</i> serovar Typhi (ATCC 6539)	49260329	Simple Science Limited	PER	
810.2300	<i>Escherichia coli</i> (ATCC 11229)	49260330	Simple Science Limited	PER	
<b>§ 158.2230: Toxicology Data Requirements</b>					
870.1100	Acute oral toxicity	46232405	Occulus Innovative Sciences Inc.	PER	
870.1200	Acute dermal toxicity	46232406	Occulus Innovative Sciences Inc.	PER	
870.1300	Acute inhalation toxicity	46232407	Occulus Innovative Sciences Inc.	PER	
870.2400	Primary eye irritation	46453701	Occulus Innovative Sciences Inc.	PER	
870.2500	Primary dermal irritation	46453702	Occulus Innovative Sciences Inc.	PER	
870.2600	Dermal sensitization	46232410	Occulus Innovative Sciences Inc.	PER	

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**Ingredients:** Hypochlorous acid (CAS# 7790-92-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
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Date: March 22, 2017 EPA Reg. No./File Symbol: 777-XXX Page 2 of 3

Applicant's/Registrant's Name and Address: **Reckitt Benckiser, LLC**  
 Morris Corporate Center IV  
 399 Interpace Pkwy.  
 Parsippany, NJ 07054-0225 Product Name: **Cousteau**

Ingredients: Hypochlorous acid (CAS# 7790-92-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Notes
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Signature: 	Name and Title: <b>Jennifer DeCarlo</b> Senior Regulatory Associate	Date: March 22, 2017
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